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7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **NORTHERN DIVISION**

11 In re
12 HVI CAT CANYON, INC.,
13 Debtor.

Case No. 9:19-bk-11573-MB
Chapter 11

**EVIDENTIARY OBJECTIONS TO
DECLARATION OF DAVID A. COLE IN
SUPPORT OF OPPOSITION TO
MOTION FOR AN ORDER (1) SETTING
PROCEDURES FOR ASSUMPTION OF
OIL AND GAS LEASES; (2)
ASSUMPTION OF SURFACE LEASES;
AND (3) AUTHORIZING REJECTION OF
LAKEVIEW OFFICE AND WAREHOUSE
LEASE**

Date: April 17, 2020
Time: 10:00 a.m.
Ctrm.: 201
1415 State Street
Santa Barbara, California

21
22 Michael A. McConnell, the Chapter 11 Trustee (the "Trustee") for the bankruptcy estate of
23 HVI Cat Canyon, Inc. (the "Debtor"), hereby respectfully submits his evidentiary objections to the
24 Declaration Of David A. Cole in Support of Opposition to Motion for an Order (1) Setting
25 Procedures for Assumption of Oil and Gas Leases; (2) Assumption of Surface Leases; and (3)
26 Authorizing Rejection of Lakeview Office and Warehouse Lease (*docket no. 907*) (the
27 "Declaration").
28

The Trustee objects to the entirety of the Declaration on the grounds that it has not been signed by David A. Cole.

The Court is respectfully requested to sustain the following specific evidentiary objections:

#	Statement/Exhibit	Objection
1.	<p>“7. The Oil Leases granted the Debtor the right to extract oil, gas and/or minerals from the Fee Properties subject to the Debtor's compliance with terms and conditions in the Oil Leases. Those terms included the obligations to pay royalties and perform other obligations including remediation and restoration of the property under certain circumstances.”</p> <p>Declaration at ¶ 7., page 2, lines 10-13.</p>	<p>Hearsay, Fed. R. Evid. 801, 802</p> <p>Best Evidence Rule, Fed R. Evid. 1002</p> <p>Legal Conclusion</p>
2.	<p>“8. By 2005, the Debtor breached the Oil Leases by, among other things, having failed to make royalty payments as required thereunder. Despite demand, the Debtor failed to cure the defaults or rectify such breaches.”</p> <p>Declaration at ¶ 8., page 2, lines 15-17.</p>	Legal Conclusion
3.	<p>“9. The Claimants and the Debtor resolved the claims asserted in the State Court Action as set forth in the Settlement and Release Agreement, dated March 3, 2009 (the “<u>Settlement Agreement</u>”).”</p> <p>Declaration at ¶ 9., page 2, lines 20-22.</p>	<p>Irrelevant, Fed. R. Evid. 401, 402</p> <p>Legal Conclusion</p> <p>Best Evidence Rule, Fed R. Evid. 1002</p>
4.	<p>“The Settlement Agreement provided for, among other things, certain rights conferred to the Debtor to continue its oil production operations at the Fee Properties. The Settlement Agreement required, among other things, for the Debtor to timely pay royalties and a settlement amount, and when the Fee Properties were no longer needed for oil production, to promptly quitclaim its interests pertaining to the Fee Properties, which are identified in the Unit Agreement of REDU as Tracts 4, 10, 34 or 73 of REDU (the “Additional Quitclaim”). [See Proofs of Claim; Exh. 3]”</p> <p>Declaration at ¶ 9., page 2, lines 22-27.</p>	<p>Irrelevant, Fed. R. Evid. 401, 402</p> <p>Hearsay, Fed. R. Evid. 801, 802</p> <p>Best Evidence Rule, Fed R. Evid. 1002</p>

#	Statement/Exhibit	Objection
5.	<p>“Based upon my review of the Transaction Detail, the last royalty payments received are as follows: December 6, 2016 in the amount of \$1,220.62 on the Guarantee Oil Leases and December 6, 2016 in the amount of \$2,320.75 on the Laor Oil Leases.”</p> <p>Declaration at ¶ 10., page 3, lines 4-6.</p>	<p>Hearsay, Fed. R. Evid. 801, 802</p> <p>Best Evidence Rule, Fed R. Evid. 1002</p>
6.	<p>“A true and correct copy of the Transaction Detail is attached hereto as Exhibit 2.”</p> <p>Declaration at ¶ 10., page 3, lines 6-7.</p>	Hearsay, Fed. R. Evid. 801, 802
7.	<p>“11. Such failure constituted a default under the Settlement Agreement, the Oil Leases and the REDU Agreement.”</p> <p>Declaration at ¶ 11., page 3, lines 8-9.</p>	Legal Conclusion
8.	<p>“On December 8, 2017, the Claimants provided a Notice of Delinquent Royalties (the "Default Notice"): (a) demanding cure of the unpaid royalties; (b) advising of the proposed termination of the Oil Leases; and (c) demanding execution of the Additional Quitclaim. The Debtor failed to respond to the Default Notice or cure the identified defaults.”</p> <p>Declaration at ¶ 11., page 3, lines 9-12.</p>	Hearsay, Fed. R. Evid. 801, 802
9.	<p>“12. Since December 2016, the Claimants have not received any royalties.”</p> <p>Declaration at ¶ 12., page 3, line 13.</p>	Untrue as Trustee has made royalty payments
10.	<p>“Further, after reviewing public data available at the Website of the California Department of Conservation, Geologic Energy Management Division ("CalGem", formerly known as the Division of Oil, Gas, and Geothermal Resource or "DOGGR" until January 1, 2020), it is clear that the Debtor has ceased production or extraction of oil at the Fee Properties since January 2018.”</p> <p>Declaration at ¶ 12., page 3, lines 13-17.</p>	<p>Lack of Foundation, Fed. R. Evid. 601, 602</p> <p>Hearsay, Fed. R. Evid. 801, 802</p> <p>Conclusory</p>

#	Statement/Exhibit	Objection
11.	<p>“Oil operators are required to report all production to CalGem ("DOGGR") on a monthly basis and the last reported production listed on the State's site was reported on February 1, 2018.”</p> <p>Declaration at ¶ 12., page 3, lines 17-19.</p>	<p>Lack of Foundation, Fed. R. Evid. 601, 602</p> <p>Hearsay, Fed. R. Evid. 801, 802</p> <p>Conclusory</p>
12.	<p>“By not producing oil and not paying royalties for over two years the Debtor has essentially abandoned the oilfields located at the Fee Properties, which results in substantial liability, including but not limited to the costs of abandoning oil wells to state standards, removing pipelines and facilities, and performing environmental cleanup.”</p> <p>Declaration at ¶ 12., page 3, lines 19-22.</p>	Legal Conclusion
13.	<p>“The Debtor is further liable for substantial environmental cleanup costs in connection with its prior operations.”</p> <p>Declaration at ¶ 12., page 3, lines 23-24.</p>	Legal Conclusion
14.	<p>“(b) <i>Well Abandonment</i>: Upon abandonment of oil wells, the Debtor was obligated to complete legally required oilfield cleanup work and removal of oilfield facilities. The estimated abandonment costs per well is estimated to be \$125,000 (for abandonment & cleanup) and \$500,000 (for removal of other oilfield facilities). The Claimants believe there are eleven (11) wells at the Guarantee Fee Property and one (1) well at the Laor Fee Property resulting in abandonment costs estimated at \$2,000,000. The cost could be in the range of \$250,000 to \$500,000 per well, and will also be greater if there are additional wells at the sites.”</p> <p>Declaration at ¶ 13., page 4, lines 1-7.</p>	<p>Lack of Foundation, Fed. R. Evid. 601, 602</p> <p>Speculation</p> <p>Improper Opinion Testimony, Fed R. Evid. 701, 702</p> <p>Legal Conclusion</p>

#	Statement/Exhibit	Objection
15.	“(c) <i>Environmental Remediation</i> : It is estimated that the cost of remediation is not less than \$500,000 (\$450,000 as to the Guarantee Fee Property and \$50,000 as to the Laor Fee Property) but could be greater depending on the results of environmental testing.” Declaration at ¶ 13., page 4, lines 8-10.	Lack of Foundation, Fed. R. Evid. 601, 602 Speculation Improper Opinion Testimony, Fed R. Evid. 701, 702

DATED: April 10, 2020

DANNING, GILL, ISRAEL & KRASNOFF, LLP

By: /s/ Aaron E. de Leest

AARON E. DE LEEST

Attorneys for Michael A. McConnell,
Chapter 11 Trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): EVIDENTIARY OBJECTIONS TO DECLARATION OF DAVID A. COLE IN SUPPORT OF OPPOSITION TO MOTION FOR AN ORDER (1) SETTING PROCEDURES FOR ASSUMPTION OF OIL AND GAS LEASES; (2) ASSUMPTION OF SURFACE LEASES; AND (3) AUTHORIZING REJECTION OF LAKEVIEW OFFICE AND WAREHOUSE LEASE will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On April 10, 2020 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL: On April 10, 2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by causing to be placed a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor
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c/o Capitol Corporate Services, Inc.
36 S. 18th Avenue, Suite D
Brighton, CO 80601

Debtor
HVI Cat Canyon, Inc.
630 Fifth Avenue
Suite 2410
New York, NY 10111

☐ Service information continued on attached page.

3. SERVED BY OVERNIGHT MAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on __, I served the following persons and/or entities by overnight mail service. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 10, 2020

Date

Beverly Lew

Printed Name

/s/ Beverly Lew

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

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